

UNITED STATES BANKRUPTCY COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	Valerie A. Bennish	:	Chapter 13
		:	
	<u>Debtor</u>	:	
	Wilmington Savings Fund Society, FSB	:	
	Movant	:	Bankruptcy Case Number
		:	19-16405 ELF
		:	
v.		:	
		:	
Valerie A. Bennish		:	
		:	
Respondent/Debtor		:	
		:	
And		:	
		:	
Kenneth E. West, Esquire		:	
Trustee		:	

**Debtor's Response to the Motion of Wilmington Savings Fund Society, FSB
for Relief from the Automatic Stay**

Debtor, **Valerie A. Bennish**, by and through her counsel, **MICHAEL SCHWARTZ, ESQUIRE**, hereby files this response to the Motion for Relief of Movant and in support thereof avers as follows:

1. ADMITTED.
2. ADMITTED.
3. ADMITTED.
4. ADMITTED.
5. ADMITTED.
6. ADMITTED.
7. ADMITTED.

8. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

9. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant. By way of further response, Debtor is current with payments post-petition.

10. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

11. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

12. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

13. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

WHEREFORE, Debtor, **Valerie A. Bennish**, requests this Honorable Court deny the motion of Wilmington Savings Fund Society, FSB for relief from automatic stay and to declare the automatic stay is still in effect.

Respectfully Submitted,

\s\ Michael Schwartz
MICHAEL SCHWARTZ, ESQUIRE
Attorney for Debtor